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U.S. DISTRICT COURT

WESTERN DISTRICT OF MICHIGAN

BY ald SCANNED BY 2/4/11

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MICHIGAN

1:11-cv-351
Paul L. Maloney
U.S. District Judge

William Lewis Vinton III., Plaintiff In
Pro Per.

V.

Case Number:

NCO Financial Systems, Inc.
Defendant.,

SUMMONS AND COMPLAINT.

This Summons And Complaint includes pendent
state claims.

1. After receiving several automated calls from: NCO
Financial Systems, Inc. To contact Anthony Davis at

1-800-956-4638. Regarding My Pacer Service Center.- US Court.— Remaining Amount Due Of \$ 60.43., Account Number ending in: xxx2733. Plaintiff sent a Cease And Desist Letter On: March 02, 2011., Requesting that Defendant no longer contact me regarding this debt under The Fair Debt Collections Practice Act And The Michigan Collections Practice Act. (Refer To Exhibit A.).

2. Defendant Signed for my Cease And Desist Letter on March 07, 2011., Which was sent Certified Mail With Signature Delivery Confirmation. (Refer To Exhibit B.).

3. Despite the Defendant receiving my Cease And Desist Letter on March 07, 2011., They continue to call in reference to the \$ 60.43., still owed by automated messages in an attempt to collect a debt. (Refer To Exhibit

C.).

Due to the continuous calls from the Defendant attempting to collect the remaining amount owed., Despite Defendant receiving and signing for my Cease And Desist Letter requesting they no longer contact me regarding this debt on March 07, 2011., Defendant violated the following: FDCPA { 805 15 USC 1692. (c)., { 806 15 USC 1692. (d)., (5).,
1
And The Michigan Occupational Code Act 299 Of 1980., 339.
1
15., Sec. 915., (n)., (q). (Refer To Exhibits D And E.).

1.

Article 9 under PA 299 of 1980., Created The Michigan Collection Practices Board.

3.

**Due to numerous violations of the FDCPA { 805
15 U S C 1692 (c)., { 806 15 U S C 1692 (d)., (5).,
Plaintiff should be awarded the following under { 813
15 U S C 1692 (k).**

1. Actual Damages

**2. Additional Damages the court may allow but
not exceeding \$ 1,000.00.**

3. Court Costs.

4. Attorney's Fees.

**Plaintiff is also requesting the court award to him
damages under The Michigan Occupational Code Act 299.**

, 339.916., Sec. 916. (1), (2)., As Defendant willfully v violated The Michigan Occupational Code Act 339.915., Sec. 915. (n)., due to them calling me repeatedly regarding this debt despite the Defendant receiving the Cease And Desist Letter On March 07, 2011., Which they signed for in the amount of \$ 1,200.00., which is \$ 150.00. Per willful violation which were eight in total after the Cease And Desist Letter was received. (Refer To Exhibits: A., B., C., A and D.), And for Defendant willfully violating The Michigan Occupation Code Act 339.915., Sec. 915. (q)., due to Defendants failure to implement a procedure designed to prevent an violation by an employee as they placed automated phone calls in an attempt to collect a debt., despite recei

ving a Cease And Desist Letter On March 07, 2011., In the amount of \$ 1,200.00., Which is \$ 150.00. Per willful violation which were eight in total after the Cease And Desist Letter was received. (Refer To Exhibits: A., B., C., And D.).

Plaintiff should be awarded reasonable attorney's fees and costs incurred in connection with this action.

Monday
Dated: April 04, 2014

William Lewis
Vinton III

William Lewis Vinton III., Plaintiff In Pro Per.
827 Second Street N. W.
Grand Rapids, MI. 49504-5122.
Phone: 616-774-8353.